

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	CASE NO. 18 B 33364
Algernon Meakens,)	
)	HON. Timothy A. Barnes
)	CHAPTER 13
DEBTOR.)	

NOTICE OF MOTION

TO: Marilyn O Marshall, 224 South Michigan Ste 800, Chicago, IL 60604, via electronic court notification;

See attached service list.

Please take notice that on January 23, 2020 at 9:30 a.m. I shall appear before the Honorable Timothy A. Barnes in Courtroom 744 of the United States Bankruptcy Court, Everett McKinley Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois 60604 and present the attached motion and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditor and also to the attached service list via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on December 16, 2019.

/s/ Alexander Nohr
Attorney for Debtors

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625

Label Matrix for local noticing

0752-1

Case 18-33364

Northern District of Illinois

Eastern Division

Mon Dec 16 08:02:53 CST 2019

ACCEPTANCE NOW

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PRA Receivables Management, LLC

PO Box 41021

Norfolk, VA 23541-1021

ACME CONTLCU

13601 S PERRY

RIVERDALE, IL 60827-1655

U.S. Bankruptcy Court

Eastern Division

219 S Dearborn

7th Floor

Chicago, IL 60604-1702

Acceptance Now

2900 Stonecrest Cir

Lithonia, GA 30038-2690

Acme Continental Credit Union

c/o Edelstein & Edelstein, P.C.

3825 W. Montrose Ave.

Chicago, IL 60618-1016

AmeriCash Loans, L.L.C.

P.O. Box 1728

Des Plaines, IL 60017-1728

Americash

1726 W Jefferson St

Joliet, IL 60435-6741

Arrow Head Advance

PO Box 6048

Pineridge, SD 57770-6048

BK OF AMER

PO BOX 1598

NORFOLK, VA 23501-1598

Brandon S. Lefkowitz

29777 Telegraph Rd

Suite 2440

Southfield, MI 48034-7667

CAPITALONE

c/o Pollack & Rosen, P.C.

1825 Barrett Lakes Blvd Suite 510

Kennesaw, GA 30144-7519

CREDIT ONE BANK NA

PO BOX 98875

LAS VEGAS, NV 89193-8875

City of Chicago - Parking and red Light Tick

121 N. LaSalle Street

Chicago, IL 60602-1202

City of Chicago Department of Finance

c/o Arnold Scott Harris, P.C.

111 W. Jackson Blvd Ste. 600

Chicago, IL 60604-3517

Comcast

p.o. box 196

Newark, NJ 07101-0196

Comet Loans

Tonto Apache Reservation #30

Payson, AZ 85541-5556

Directv, LLC

by American InfoSource as agent

4515 N Santa Fe Ave

Oklahoma City, OK 73118-7901

FIRST PREMIER BANK

c/o Jefferson Capital Systems LLC PO Box

c/o Linda Dold

Saint Cloud, MN 56302

Green Trust Cash

P.O box 340

Hays, MT 59527-0340

(p)INTERNAL REVENUE SERVICE

CENTRALIZED INSOLVENCY OPERATIONS

PO BOX 7346

PHILADELPHIA PA 19101-7346

NORTHWESTERN MEDICINE

C/O RONALD J. HENNINGS P.C.

P.O. BOX 4106

SAINT CHARLES, IL. 60174-9080

Northwestern Memorial Hospital

251 E Huron St

Chicago, IL 60611-3055

PYOD, LLC

Resurgent Capital Services

PO Box 19008

Greenville, SC 29602-9008

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

PO BOX 41067

NORFOLK VA 23541-1067

Premier Bankcard, Llc

Jefferson Capital Systems LLC Assignee

Po Box 7999

Saint Cloud Mn 56302-7999

SYNCB/CARE CREDIT

C/O P.O. BOX 965036

ORLANDO, FL 32896-0001

SYNCB/PAYPAL SMART CON

PO BOX 965005

ORLANDO, FL 32896-5005

SYNCB/WALMART

Po Box 530927

Atlanta, GA 30353-0927

Algernon Meakens 4747 S King Dr Apt 1609 Chicago, IL 60615-1378	Jacob Comrov The Semrad Law Firm LLC 20 S. Clark Street Chicago, IL 60603-1810	Marilyn O Marshall 224 South Michigan Ste 800 Chicago, IL 60604-2503
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Patrick Semrad The Semrad Law Firm, LLC 20 S. Clark St, 28th Floor Chicago, IL 60603-1811	Patrick S Layng Office of the U.S. Trustee, Region 11 219 S Dearborn St Room 873 Chicago, IL 60604-2027
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .

IRS Irs Mail Stop 4100 P-3 Kansas City, MO 64999	Portfolio Recovery Associates, LLC c/o Care Credit POB 41067 Norfolk VA 23541	(d)Portfolio Recovery Associates, LLC c/o Walmart Credit Card POB 41067 Norfolk VA 23541
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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Acme Continental Credit Union	(d)Synchrony Bank c/o PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541-1021	End of Label Matrix Mailable recipients 37 Bypassed recipients 2 Total 39
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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MOTION TO MODIFY PLAN

NOW COMES the Debtor, Algernon Meakens, by and through Debtor's attorneys, The Semrad Law Firm, LLC hereby moves this Honorable Court to Modify the confirmed Chapter 13 Plan, Debtors state the following:

1. On November 30, 2018, Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. On March 28, 2019, this Honorable Court confirmed the Debtor's Chapter 13 Plan.
3. The Chapter 13 Plan allows for secured creditors to be paid 100% of their allowed claims, and general unsecured creditors without priority to be paid 100% of their allowed claims.
4. The Chapter 13 Plan requires the Debtor to make plan payments to the Chapter 13 Trustee in the amount of \$675.00 monthly for 36 months.
5. That Debtor has been enrolled in payroll control throughout the tenure of his case.
6. That on November 30, 2018, Debtor proposed a monthly plan payment in the amount of \$485.00 per month.
7. That on December 3, 2018, a payroll control order was also filed to pay the Trustee directly out of Debtor's paychecks.
8. That on March 8, 2019, Debtor proposed an increased plan payment in the amount of \$600.00 per month.

9. That on March 20, 2019, an amended payroll control order was also filed to pay the Trustee directly out of Debtor's paychecks.
10. That on March 26, 2019, Debtor proposed another increased plan payment in the amount of \$675.00 per month.
11. That due to a clerical error, an amended payroll order, increasing Debtor's bi-weekly payroll deductions was not entered.
12. That when Debtor's plan payment increased, Debtor's employer was not timely to process the amended payroll order, and a delinquency accrued.
13. That, furthermore, that due to the clerical error of failure to enter another amended payroll order with the March 26, 2019 plan, an ongoing monthly delinquency in the amount of \$75.00 was being accrued.
14. That on December 9, 2019, Debtor's counsel filed an amended payroll order in the amount of \$675.00 to fix the error.
15. Debtor can proceed to make payments going forward.
16. Debtor respectfully requests this Honorable Court defer the current plan default to the end of the plan of reorganization.
17. Debtor is in a position to proceed with the instant case.
18. Debtor filed the instant case in good faith and intends to complete the plan of reorganization.

WHEREFORE, the Debtor prays this Honorable Court for the following relief:

- A. That this Honorable Court enter an Order deferring the current plan default to the end of the Chapter 13 Plan of reorganization; and
- B. For such other and further relief as the Court deems fair and proper.

Respectfully submitted,

/s/ Alexander Nohr
Attorney for Debtors

The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
312-913-0625